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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Office of Superfund
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Mr. Jeffrey Leed
Leed Environmental
124 Deborah Drive
Reading, PA 19610

RE: Tonolli Superfund Site - Construction Issues

Dear Jeff:

During oversight activities of the remedial action at theTonolli Corporation Superfund Site ("Site") the US Environmental Protection Agency ("EPA") has identified several items which require advanced planning and would increase the safety and potentially reducing operation and maintenance of the completed remedy for the Site. These items are discussed in detail below.

Landfill Capacity

EPA is concerned that the capacity of the landfill, in the approved design, may be inadequate to contain all lead contaminated material which will be required to be excavated to achieve the performance standard for the remedial action at the Site. If the landfill capacity is to be enlarged, beyond that provided for in the approved design, EPA and the Pennsylvania Department of Environmental Protection ("PADEP") must be provided with a revised design and adequate time to review and comment on any revision. EPA and PADEP have indicated this concern in the weekly progress meetings. Please consider this review time in any contingency planning for enlargement of the landfill beyond the approved design capacity.

EPA has been informed that lead contaminated soil may be present very close to the liner along the western side of the landfill and this contamination if excavated could possibly endanger the liner or the landfill. EPA must be notified of any proposed change to the approved design to address this area and review and approve these plans.

Concrete Foundation Walls

The Remedial Design Plans and Specifications ("RD") provided for the demolition of the buildings at the Site but did not specifically call for the removal of the concrete foundation walls. The Record of Decision ("ROD") for the Site, however, calls for the excavation of all soils with lead contamination above 1,000 mg/kg. As per the Administrative Consent Decree 03-92-03-12 to perform remedial actions on the Site, signed by the Tonolli Site Steering Committee settling parties ("TSSC"), the PADEP and EPA, discrepancies or ambiguity between the RD and the ROD are controlled by the ROD.

Areas of lead contaminated soil under or adjacent to foundation walls must be removed as part of the cleanup at the Site. Walls that impede or become unstable must be removed to access soil contamination greater than 1,000 mg/kg. Attached is a memorandum from the USACE on their engineering evaluation of excavation in the vicinity of the foundation walls at the Site.

Beyond the issue of access to contaminated soil, EPA is also concerned about the long term structural integrity of the walls. Some of the walls are already badly cracked or corroded as a result of exposure to battery acid or weathering. These walls must be removed since they represent a safety hazards and a future maintenance problem.

Finally, EPA has inspected the walls at the Site and noted staining of the concrete on some of the walls. EPA and the US Army Corp of Engineers ("USACE") will inspect and sample walls proposed to be left in place following the remedial action. Approval of the Remedial Action is dependent on the Site performance standards being met and the Site being in an acceptable final condition.

Stormwater Diversion

The RD provides for the installation of erosion and sedimentation controls at the Site. Following construction at the Site, the Site property will either be covered in stone or re-vegetated. However, the current RD plans provide for directing at least some surface water originating from offsite areas, to the north of the Site, onto the Site along a surface water pathway west of the landfill and into Basin 2 (near the former lagoon area). These offsite areas currently contain un-vegetated coal refuse, coal fines and ash. EPA acknowledges the presence of a storm water diversion structure that was constructed by the Panther Creek Partners on the land north of the Site. However, during the relatively short period of time following the construction of this structure to the present, deposition of sediment in the surface water pathway and in the lower sump area continues to occur. EPA believes it would be prudent to re-direct this offsite storm water to the east to drain into Basin 3. Additional excavation of battery casings and lead contaminated soil is already planned in the area where a surface water pathway could be cut through to drain to Basin 3. Beyond this soil excavation area, approximately 120 linear feet of cut would be required to allow the offsite stormwater to flow into Basin 3.

Culm Pile Regrading

Just north of the northwest corner of the landfill on the Site property is a pile of waste coal or culm material. Excavation of lead contaminated soil has been done in this area right up to the toe of the culm pile. The pile currently has a steep slope of approximately 1 to 1 and the culm is a very loose unstable material. Culm in this pile will have to be moved as needed to allow safe access to the lead contaminated soils at the base of the pile. Again, beyond the issue of moving culm for access to soil, EPA believes the pile should be regraded, compacted and vegetated to a stable condition following the excavation of impacted soil. This culm pile, if left in it's current condition, will be susceptible to erosion and eroded material will deposit in the Site surface water pathways. In addition to operation and maintenance issues, the pile represents a safety hazards due to it's unstable condition.

The EPA reminds the TSSC of their obligation to perform operation and maintenance activities at the Site for the next thirty years. EPA has concerns about the safety of the walls if left exposed and unsupported and the possibility that they could become an attractive nuisance at the Site. If the walls, or filled sumps and piping deteriorate in the future the TSSC will address these conditions by re-mobilizing a contractor to tear down and remove the walls and correct any settlement problems.

If you have any questions please contact me at the above number.

Sincerely,

Steven J. Donohue
Remedial Project Manager

cc: Meg Mustard (PADEP)
Jim Harbert (ACE)
Gerry Mijares (ACE)
Joe D'Onofrio (PADEP)
Thomas M. Legel, (AGC)